

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MARK CHANGIZI, MICHAEL SENGER,
and DANIEL KOTZIN

Plaintiffs,

v.

DEPARTMENT OF HEALTH AND
HUMAN SERVICES, et al.

Defendants.

Civil Action No: _____

DECLARATION OF DANIEL KOTZIN

1. I, Daniel Kotzin, am over the age of 18 and make this Declaration in support of the motion for a Preliminary Injunction in my case against the United States Surgeon General, et al.
2. I make this Declaration based on personal knowledge.
3. I have approximately 29,700 followers on Twitter, having created my account in September 2013.
4. I have been locked out of my account by Twitter two times. The first suspension was for 24 hours and the second was for 7 days.
 - a. The first tweet leading to a temporary suspension, posted on September 24, 2021, stated: "There is not now, nor has there ever been, evidence that the Covid

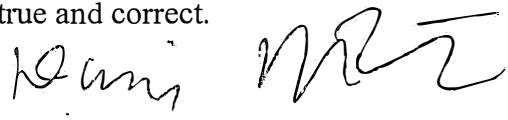
shots reduce infection or transmission. Vaccine passports; vaccine mandates; vaccine requirements -- they are all an abomination.”

- b. I received an email notification stating that my account had been locked for “violating the policy on spreading misleading and potentially harmful information related to COVID-19.” The email warned me that “repeated violations may lead to permanent suspension of your account.”
 - c. The second tweet, posted on March 7, 2022, read: “It is important to never lose sight of the fact that the global pandemic is ending not because of the vaccines, but because almost everyone on the planet got infected with covid.”
 - d. After labeling the tweet “misleading,” Twitter again notified me that I had been locked out of my account, this time for 7 days, in an email that was identical to the first one.
5. I consider the possibility of “permanent suspension” to be such a devastating prospect that I self-censor.
 - a. I contrive creative ways to avoid suspension, for example by using hypotheticals and phrasing statements in question form.
 - b. Although I believe that I have valuable information and insights to share on the subjects of treatment options, vaccines, and risk factors for a severe COVID-19 outcome, I do not do so for fear that my account will be permanently terminated.
6. Twitter suspends only those who question the wisdom and efficacy of government restrictions, or those who cast doubt on the safety or efficacy of the vaccines.

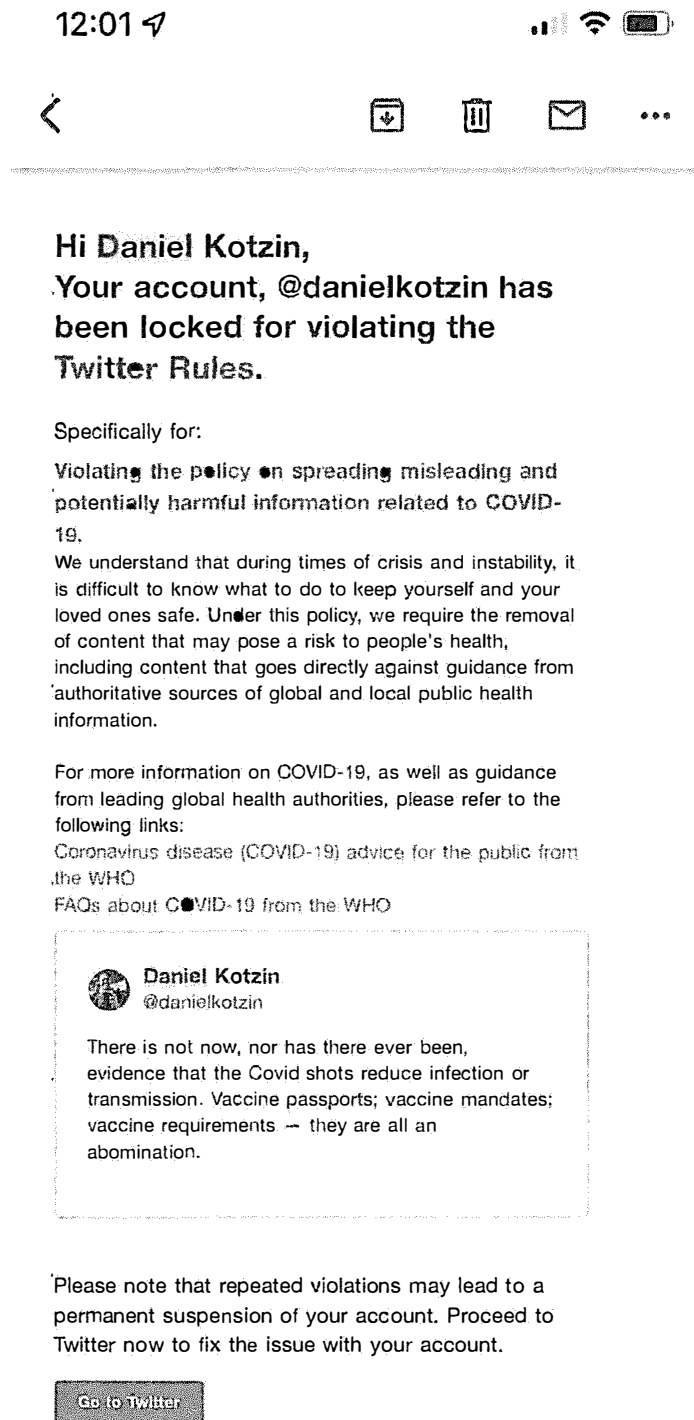
7. Upon information and belief, there are no examples of Twitter suspending individuals who have spread misinformation in the other direction -- by, for example, exaggerating the threat the virus poses to children or the effectiveness of masks or vaccines.
8. In order to open my account, I was required to give Twitter extensive personal information. I have never agreed to turn that information, or indeed any of the information that I have shared with or on Twitter, over to the government.

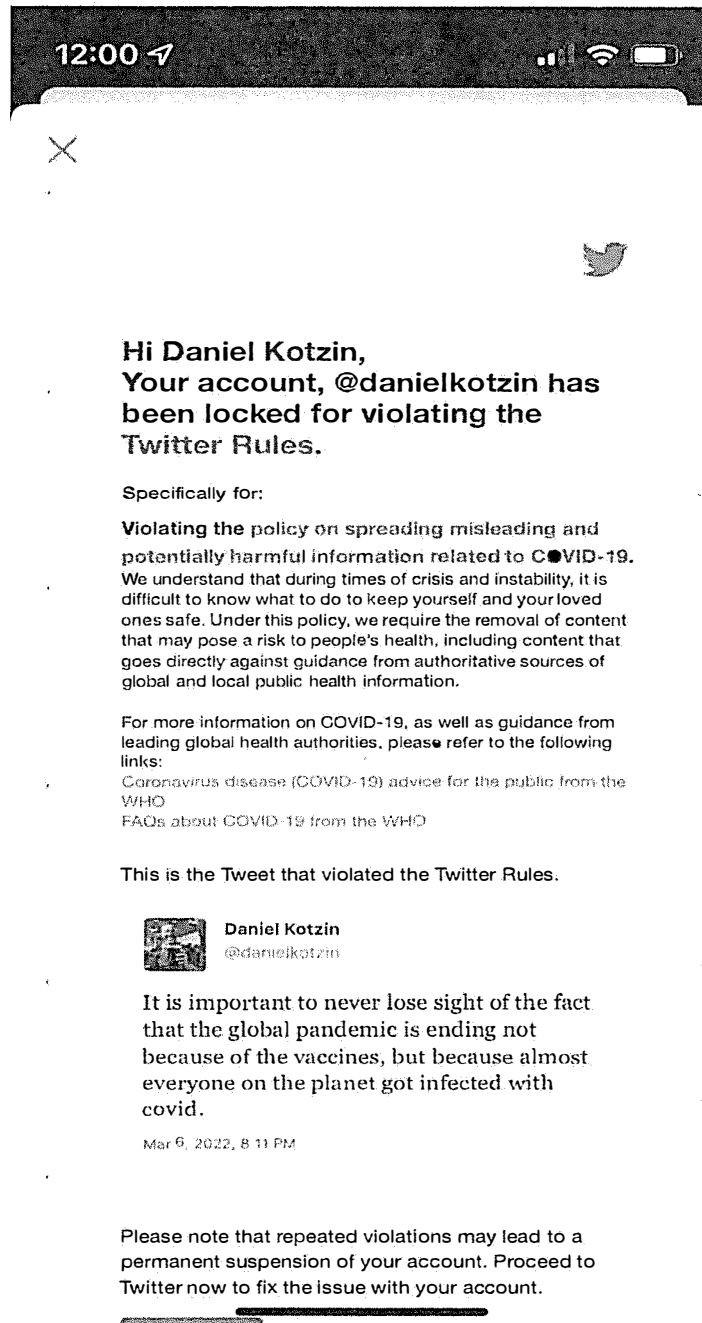
I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 3/22/22


Daniel Kotzin

Screenshot 1





Screenshot 2